



PLANNING AND URBAN DESIGN

3 February 2023

Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario M7A 2J3

**Attention:** Erika Ivanic, Senior Planner

Dear Ms. Ivanic,

**RE: ERO Item 019-5936**  
**Ministry Reference Number 20-OP-221476**  
**Approval to Amend a Municipality's Official Plan**  
**City of Toronto Official Plan Amendment No. 540**  
**(Keele Station Protected Major Transit Station Area)**  
**1728 Bloor Street West**  
WND File: 23.501

WND Associates has been retained by Fairway Developments which has an interest in the future development of the property municipally known as 1728 Bloor Street West in the City of Toronto ("the Subject Site"). It is the intent of our client to file development applications in early 2023 with a general objective of demolishing the existing commercial building and developing a new 19 storey mixed use building consistent with the policies of the City of Toronto Official Plan regarding the development criteria for redevelopment and intensification within *Mixed Use Areas and Avenues*.

### Background

The Subject Site is in the High Park North neighbourhood of the City of Toronto and is located on the north-east corner of Bloor Street West and Indian Grove. The Subject Site is currently occupied by a single storey commercial building with surface parking lot provided along Bloor Street West. The Subject Site contains an area of approximately 455.7 square metres, with frontage on Bloor Street West of 15.24 metres, and frontage on Indian Grove of 29.85 metres. The Subject Site is separated from the low-rise residential neighbourhood to the north by the 1700 Bloor Street West public parking lot and Toronto Transit Commission ("TTC") raised subway tracks. The Subject Site is located within approximately 200 metres of High Park.

With regard to public transit, the Subject Site is within a 10-minute walking distance of three (3) existing higher-order transit stations. The subject site is situated approximately 100 metres (or an approximate 2-minute walk) east of the Keele Subway Station which provides access to the TTC Line 2: Bloor-Danforth subway route.

Dundas West station is approximately 550 metres to the east of the subject site and provides higher-order transit access to the TTC Line 2: Bloor-Danforth subway route. The station includes a bus and streetcar loop providing direct connections to various surface transit routes. Bloor GO Station is further located to the east of Dundas West Station providing additional rail service connections on the Kitchener GO Line and Union Pearson Express (“UP Express”). This interchange was identified as a Mobility Hub (Dundas West-Bloor Mobility Hub) by Metrolinx in 2041 Regional Transportation Plan which is served by five modes of public transit including subway, streetcar, bus, as well as the UP Express and GO Commuter rail services. It has also been studied as a potential terminus for the future western extension of the former Relief Line subway (now Ontario Line)

High Park Station is approximately 800m (or an approximate 10 minute walk) to the west of the subject site providing higher-order transit access to the TTC Line 2: Bloor-Danforth subway route. Please refer to **Figure 1** for more information.

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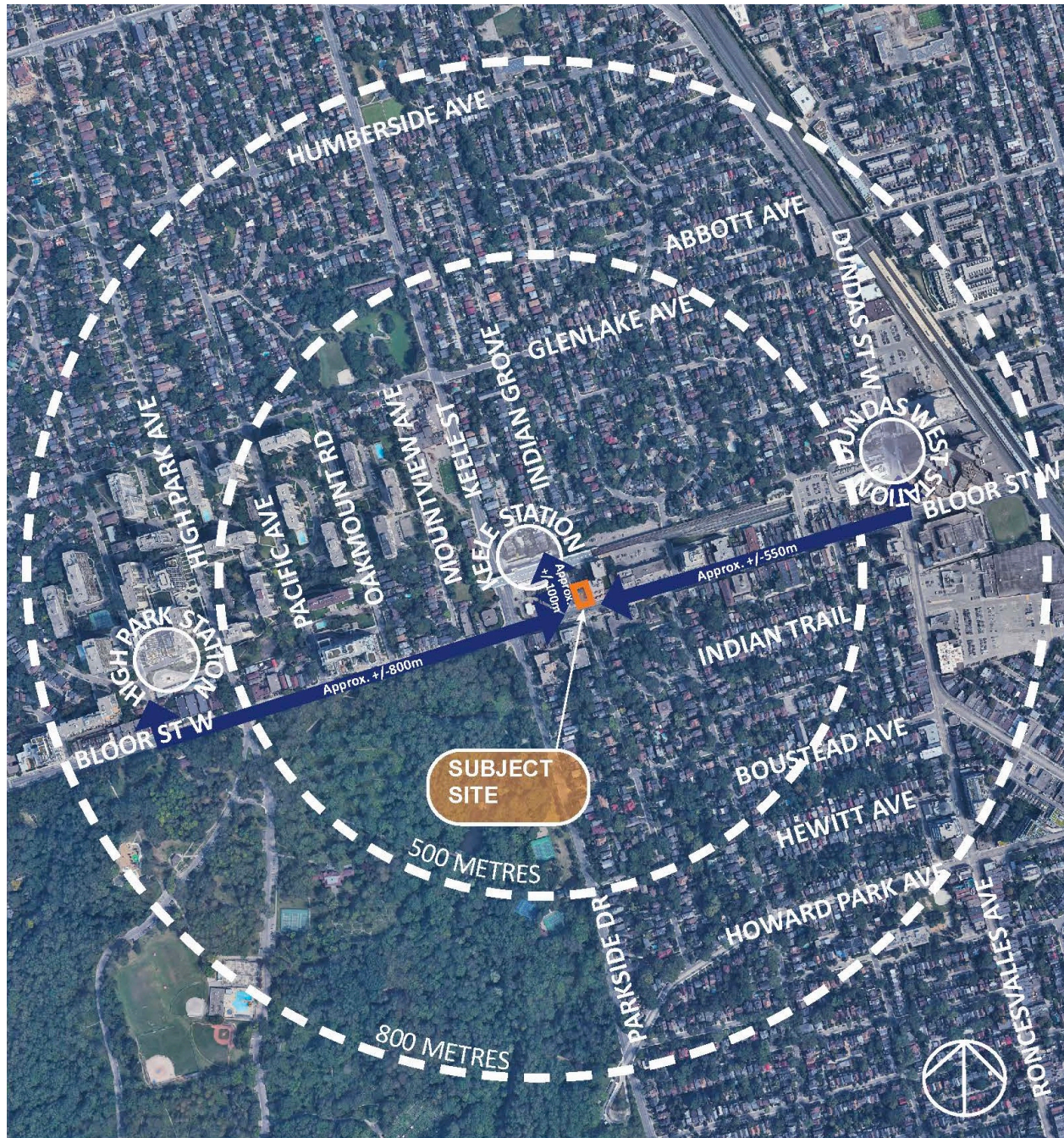


Figure 1: Subject Site Aerial

The Subject Site is located within a broader corridor characterized by a collection of existing and emerging mid-rise and tall buildings of up to 30 storeys in height and recently proposed area development applications of up to 38 storeys in height.



## Policy Context

The Subject Site is currently designated as *Mixed Use Areas* within the *Avenues* designation in the City of Toronto Official Plan where mixed use commercial and residential intensification of existing properties along Bloor Street West is anticipated to support transit and broaden the nearby land use mix.

The Subject Site is zoned Mainstreet Commercial Residential (**MCR T4.0 C1.5 R3.0**) under the former City of Toronto Zoning By-law 438-86, as amended, with an associated height overlay of 20.0 metres. The **MCR** zone permits a broad range of residential, commercial, office and retail uses, with a maximum overall density of 4.0 FSI, including a maximum density of 1.5 FSI for non-residential uses and a maximum density of 3.0 FSI for residential uses.

At its meeting on July 22, 2022, the City of Toronto's Council adopted OPA 540 with respect to the implementation of 23 PMTSAs along Bloor-Danforth corridor. The Subject Site is located within the boundary of the proposed Keele Protected Major Transit Station Area, as identified by Site and Area Specific Policy ("SASP") No. 653, as facilitated through Official Plan Amendment ("OPA") 540 (**Figure 2**).

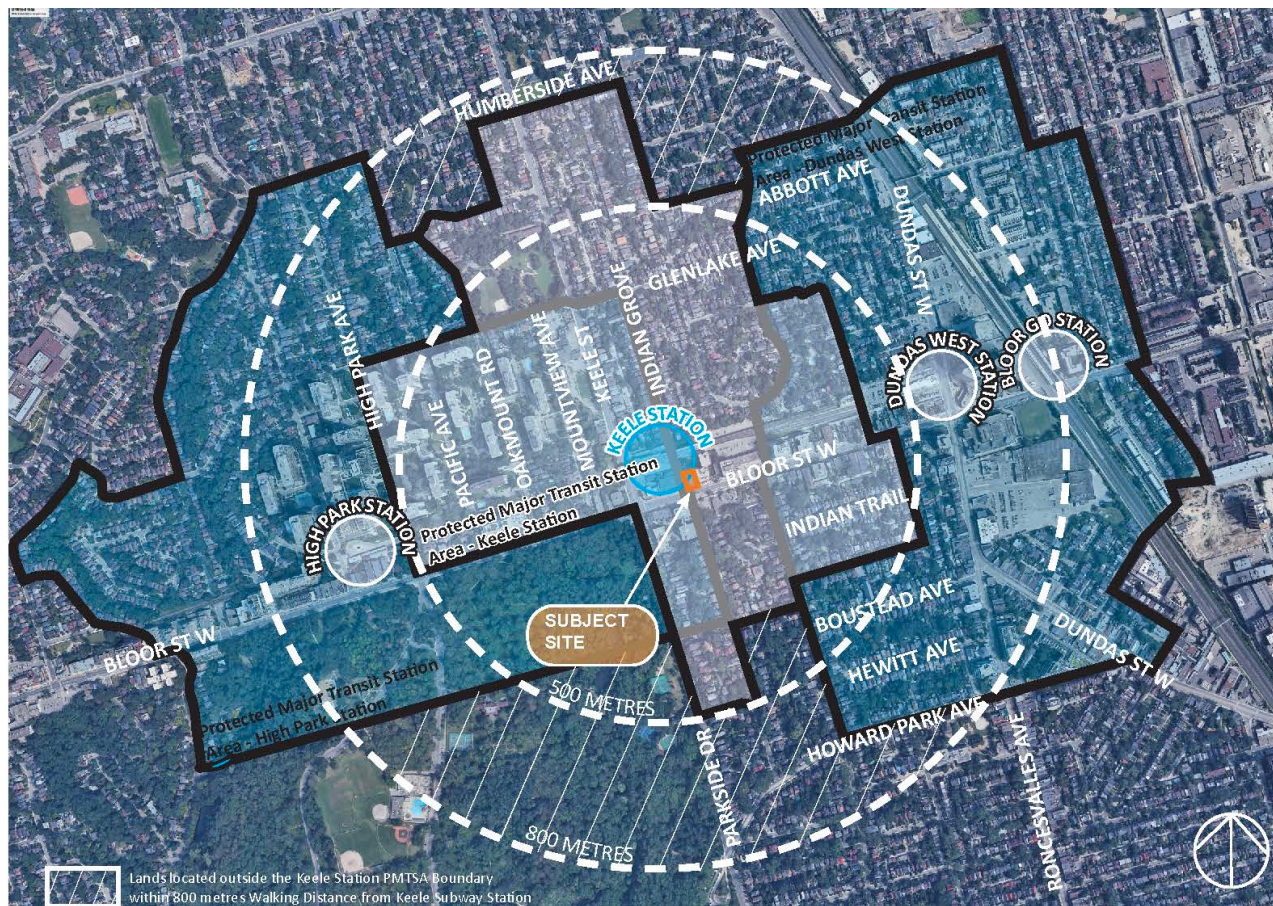


Figure 2: Location of the Subject Site (outlined in orange) in the Keele PMTSA

Existing and permitted development within the Keele Station Protected Major Transit Station Area is planned for a minimum population and employment target of 250 residents and jobs combined per hectare. Map 2 of the PMTSA delineation assigns a minimum density on a site-specific basis. Properties along Dundas Street West are identified with a minimum FSI of 2.0 times applicable site area (**Figure 3**).

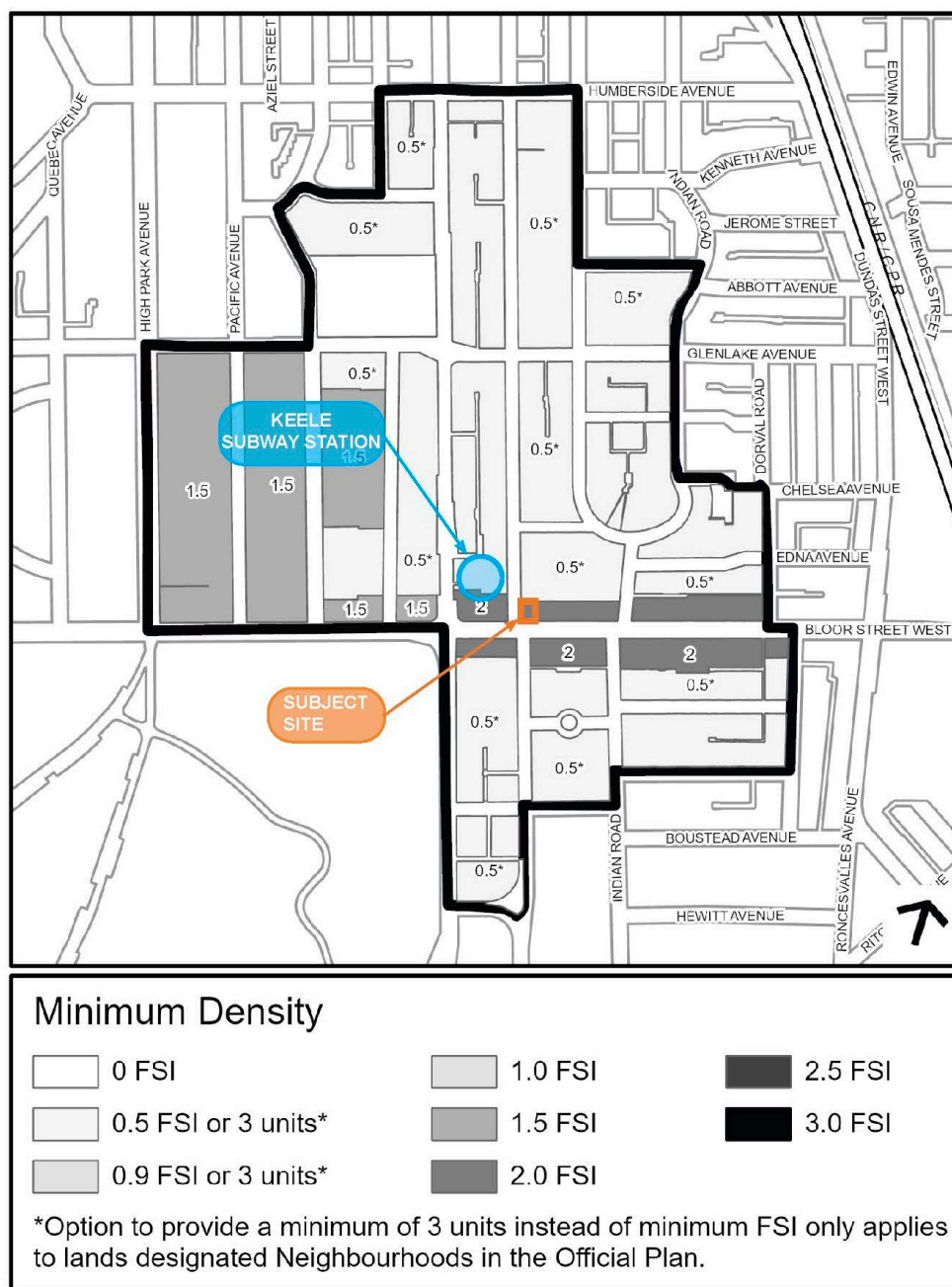


Figure 3: Site and Area Specific Policy No.653, Keele Protected Major Transit Station Area, Map 2- Minimum Densities



The intent of the proposed Protected Major Transit Station Area (“PMTSA”) is to recognize and encourage growth within the delineated major transit stations areas, as directed by the Provincial Policy Statement 2020 (PPS) and the Growth Plan for the Greater Golden Horseshoe 2019 (“Growth Plan”).

Section 1.1.3.1 the PPS states *“Settlement areas shall be the focus of growth and development”*. Policy 1.1.3.2 of the PPS sets out *“land use patterns within settlement areas shall be based on densities and a mix of land uses which: efficiently use land and resources [and] are appropriate for, and efficiently use, the infrastructure and public service facilities which are planned or available”*.

The Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan”) a framework for the development and environmental protection of the municipalities located within the Greater Horseshoe Area, including minimum intensification and density targets which “municipalities are encouraged to go beyond”, where appropriate. The Growth Plan defines Major Transit Station Areas *“as the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.”*

The Subject Site is in a transit-rich area and is exceptionally well-served by higher-order transit and surface transit routes. It is located within 500-800 metres walking distance of three (or more) existing higher-order transit stations including Dundas West-Bloor Mobility Hub. Please Refer to **Figure 2**.

### Comments

In our opinion, a minimum density of 2.0 FSI for the Subject Site as proposed for the Keele PMTSA in OPA 540, is too low, and is not consistent with Provincial Policy which supports the prioritization of intensification and higher densities in proximity to existing higher order transit infrastructure (TTC, GO and UP Express), and creation of compact and transit-supportive complete communities.

The Keele PMTSA currently contains approximately 164 residents and jobs per hectare (as identified in the 2016 Census data). Increasing a minimum density for the properties within the boundary of the Keele PMTSA will support further intensification and higher density growth in the Keele PMTSA that will assist with meeting and exceeding the minimum target of 250 residents and jobs combined per hectare as is planned by OPA 540. We note that the delineation of the PMTSA boundary has excluded significant areas of land within the 800 metre radius thereby artificially limiting the density expectations in the smaller PMTSA. While we are not suggesting to the Minister that he should consider increasing the boundary, a greater minimum density should at a minimum be ascribed for lands within the PMTSA closest to transit and designated Mixed Use Areas.

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Moreover, the maximum as-of-right FSI of 4.0 times site area permitted by the current Zoning By-law 1222-2009 already exceeds the planned minimum FSI of 2.0 times lot area as per the Council-adopted PMTSA policies under OPA No. 540, and as such the new policy will not be an incentive to increase densities beyond the as of right permissions – in fact it may even facilitate lesser density such as the continuation of the low density car oriented use currently on the site.

Other applications submitted within the surrounding area would also support a higher minimum density on both an FSI and a people and jobs per hectare basis. In our view, the City has not appropriately set minimum densities for the Keele Station PMTSA, and as adopted by Council the densities proposed do not reflect ongoing applications in the area or the mid-rise and tall building built forms planned for the Bloor Street West Corridor.

Therefore, we recommend that the Minister consider increasing the minimum density of the subject site and the other lands along the north side of Bloor Street between Keele Street and Dorval Road to at least 10.0 FSI which would allow for the optimized use of the land in an area which is well-served by a range of retail, services, facilities, and amenities, and is located within a ten-minute walking distance to three higher-order transit stations, as shown in **Figure 4**. Furthermore, it would create intensification opportunities which aligns with Provincial Policy direction to reinforce the integration of land use and urban transportation systems. The north side of Bloor Street is buffered from the Neighbourhoods to the north by significant transit infrastructure and setbacks making the north side ideal for realizing a higher threshold of intensification.

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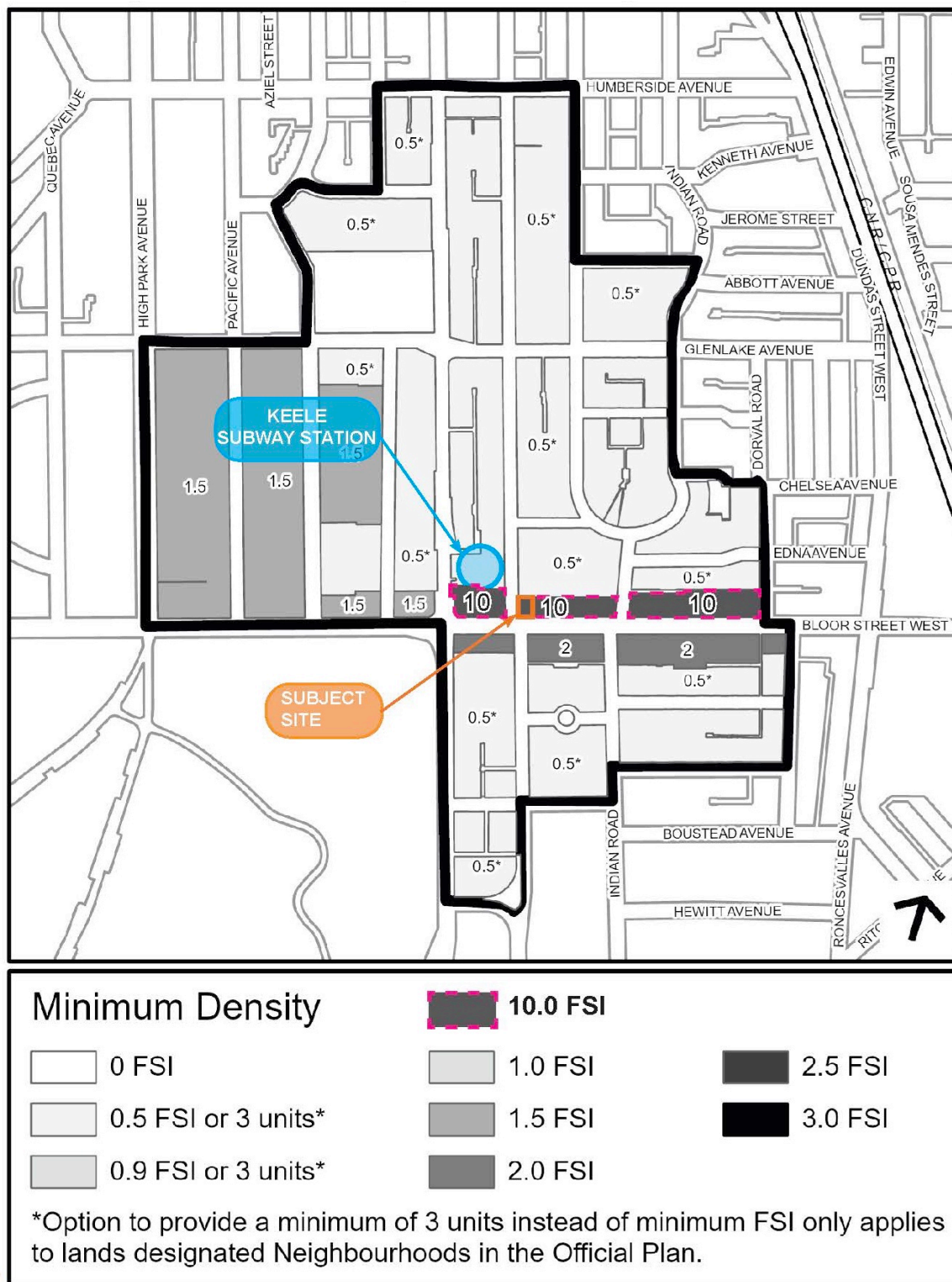


Figure 4: Suggested Modification to OPA 540 - SASP #653 proposing a minimum density of 10.0 FSI



We would be pleased to address further comments or questions should they arise upon review of this comment submission and prior to any Decision on the City's PMTSA policies. We request that the undersigned be notified of any Decision(s) by the Minister.

Yours very truly,

**WND associates**

planning + urban design

A handwritten signature in black ink, appearing to read 'A Ferancik', written in a cursive style.

Andrew Ferancik, MCIP, RPP  
Principal